

# **EXHIBIT 7**

**EXHIBIT TO  
JOINT PRETRIAL ORDER**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

VIRGINIA ELIZONDO,  
*Plaintiff,*

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v.

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Civil Action No. 4:21-CV-01997

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SPRING BRANCH INDEPENDENT SCHOOL  
DISTRICT, & COURTNEY ANDERSON,  
JOHN PEREZ, CAROLINE BENNETT,  
SHANNON MAHAN, MINDA CAESAR,  
CHRIS EARNEST, & LISA ALPE IN  
THEIR OFFICIAL CAPACITIES AS  
MEMBERS OF THE BOARD OF TRUSTEES  
OF SPRING BRANCH ISD

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*Defendants.*

**PLAINTIFF'S WITNESS LIST**

Plaintiff expects to call the following trial witnesses:

1. **Diana Alexander**, 10238 Rothbury, Houston, Texas 77045. Ms. Alexander is a registered voter in SBISD. Ms. Alexander is expected to testify about her experiences as a Hispanic SBISD resident and voter, including but not limited to the socio-economic and community characteristics of SBISD, a proposed minority-majority CVAP district and factors that have hindered the ability of Hispanics to participate effectively in the political process in SBISD. Ms. Alexander may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.
2. **Ricardo Barnes**, 8575 Pitner Road, Houston, Texas 77080. Mr. Barnes is Executive Director of the Spring Branch Family Development Center and may testify about the socio-economic and community characteristics SBISD, a proposed minority-majority CVAP district and factors that affect the ability of Hispanics to participate effectively in the political process in SBISD. Mr. Barnes may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30,

50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.

3. **Patricia Cabrera**, 1407 Lynnvlew, Houston, Texas 77055. Ms. Cabrera is a registered voter in SBISD. Ms. Cabrera is expected to testify about her experiences as a Hispanic SBISD resident and voter, including but not limited to the socio-economic and community characteristics of SBISD, a proposed minority-majority CVAP district and factors that have hindered the ability of Hispanics to participate effectively in the political process in SBISD. Ms. Cabrera may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.
4. **Kristin Craft, Ed.D.**, c/o Defendants' counsel. Dr. Craft is SBISD's Associate Superintendent of Academics, was one of SBISD's designated corporate representatives and is expected to testify about the subjects on which the District designated her to be its representative, including but not limited to the subjects on which she was deposed.
5. **Virginia Elizondo, Ed.D.**, 9235 Blankenship Drive, Houston, Texas 77080. Dr. Elizondo is the plaintiff. She is a registered voter in the Spring Branch Independent School District ("SBISD"), a SBISD parent, and was twice a candidate for election as a SBISD trustee. Dr. Elizondo is expected to testify about her experiences as a Hispanic SBISD resident, parent, voter and candidate, including but not limited to the socio-economic and community characteristics of SBISD, a proposed minority-majority CVAP district, and her reasons for contesting the legality of SBISD's at-large system of electing its trustees. Dr. Elizondo may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.
6. **R. Jason Griffin**, 8709 Cedarspur Drive, Houston, Texas 77055. Mr. Griffin is a registered voter in SBISD. Mr. Griffin is expected to testify about socio-economic and community characteristics of SBISD, a proposed minority-majority CVAP district, events occurring during the 2021 SBISD trustee election campaign and factors that hinder the ability of Hispanics to participate effectively in the political process in SBISD. Mr. Griffin may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the

Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.

7. **Karen Heath, Ed.D.**, c/o Defendants' counsel. Dr. Heath is SBISD's Associate Superintendent of Administration and Talent, was one of SBISD's designated corporate representatives and is expected to testify about the subjects on which the District designated her to be its representative, including but not limited to the subjects on which she was deposed.
8. **Duncan Klussmann, Ed.D.**, 1244 Cortlandt St., Houston, Texas 77008. Dr. Klussmann is a former SBISD Superintendent, and may testify about his past experiences as a classroom teacher, assistant school principal, school principal, interim superintendent, area superintendent, superintendent and parent of former SBISD students, the socio-economic and community characteristics of SBISD and a proposed minority-majority CVAP district, the operations of the SBISD Board of Trustees, and factors that affect the ability of Hispanics to participate effectively in the political process in SBISD. D. Klussmann may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.
9. **Noel Lezama**, 9038 Colleen Road, Houston, Texas 77080. Mr. Lezama is a registered voter in SBISD, a SBISD parent, and a former candidate for elections as a SBISD trustee. Mr. Lezama is expected to testify about his experiences as a Hispanic SBISD resident, parent, voter and candidate, including but not limited to the socio-economic and community characteristics of SBISD, a proposed minority-majority CVAP district and factors that have hindered the ability of Hispanics to participate effectively in the political process in SBISD. Mr. Lezama may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.
10. **David Lopez**, 9521 Kerrwood Ln., Houston, Texas 77080. Mr. Lopez is a registered voter in SBISD, a SBISD parent, and a former candidate for elections as a SBISD trustee. Mr. Lopez is expected to testify about his experiences as a Hispanic SBISD resident, parent, voter and candidate, including but not limited to the socio-economic and community characteristics of SBISD, a proposed minority-majority CVAP district and factors that have hindered the ability of Hispanics to participate effectively in the political process in SBISD. Mr. Lopez may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-

exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.

11. **Christine Porter**, c/o Defendants' counsel. Ms. Porter is SBISD's Chief Financial Officer, was one of SBISD's designated corporate representatives and is expected to testify about the subjects on which the District designated her to be its representative, including but not limited to the subjects on which she was deposed.
12. **Roy Rodney**, 800 Bering Drive, Suite 220, Houston, Texas 77057. Mr. Rodney is expected to testify about his experiences as a SBISD resident, parent and voter, including his involvement with the Coalition of Advocates for Restorative Education, preparation of "A Call for Restorative Education Initiatives in the Administration of Discipline in Spring Branch ISD - Report on Discipline and the Disciplinary Alternative Education Program in Spring Branch ISD," the lack of responsiveness of the SBISD Board of Trustees and administration to evidence of disparate disciplinary practices in SBISD, and his observations concerning the what he considers a disparate allocation of resources and access to SBISD facilities to the disadvantage of minority children and his conclusion that adoption of a single-member district plan would make a positive difference. Mr. Rodney may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.
13. **James Shaddix**, 11920 N. Durette Drive, Houston, Texas 77024. Mr. Shaddix is a long-time resident and registered voter in SBISD, a parent of former SBISD students, and an active volunteer in the SBISD community. Mr. Shaddix is expected to testify about the socio-economic and community characteristics of SBISD and a proposed minority-majority CVAP district and factors that have hindered the ability of Hispanics to participate effectively in the political process in SBISD. Mr. Shaddix may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.
14. **Robert M. Stein, Ph.D.**, Rice University, Houston, Texas 77251. Dr. Stein is the Lena Grohlman Fox Professor of Political Science and a fellow in urban politics at Rice University. Dr. Stein is an expert witness who is expected to testify: (a) that there is statistically significant evidence of racially-polarized voting in SBISD Board of Trustee elections for the period 2015-2023; (b) White Non-Hispanics in SBISD vote

sufficiently as a bloc to enable them, in the absence of special circumstances, to defeat the minority voters' preferred candidates of choice; (c) the geographic concentration of Hispanics in SBISD is sufficient to constitute a majority of the voting-age population in one or more single member districts under an illustrative seven-district plan; (d) strong evidence exists in the scholarly literature that: (i) single member district forms of representation enhance proportional representation of minority candidates on legislative bodies; (ii) single member district representation increases the likelihood that minority candidates will contest elections for positions on legislative bodies; (iii) single member district representation will produce policies more responsive to the preferences of minority voters; and (e) in his opinion, SBISD should adopt a single member district plan for the election of the district's seven trustees. Dr. Stein also may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act, and offer testimony in rebuttal to opinion testimony offered by Defendants' expert, John Alford, Ph.D.

15. **Andres Tijerina, Ph.D.**, 2716 Tether Trail, Austin, Texas 78704. Dr. Tijerina is a Professor of history at Austin Community College and has taught at the University of Texas at Austin, the University of Texas at San Antonio and Texas Tech University. Dr. Tijerina is an expert witness who is expected to testify about the history of the violation of civil rights of Latinos in Texas, with emphasis on the electoral process and that, as a result of historical discrimination against Latinos in Texas, Latinos in Spring Branch and in Houston, Texas still bear the effects of this discrimination, which hinders their ability to participate effectively in the political process. Dr. Tijerina may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.

Plaintiff may call the following witnesses:

16. **J. Carter Breed**, c/o Defendants' counsel. Mr. Breed is a former SBISD trustee and may testify about socio-economic and community characteristics of SBISD, a proposed minority-majority CVAP district, factors that affect the ability of Hispanics to participate effectively in the political process in SBISD, and the subjects on which he was deposed. Mr. Breed may testify

about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.

17. **Minda Caesar**, c/o Defendants' counsel. Ms. Caesar is a SBISD trustee and may testify about socio-economic and community characteristics of SBISD, a proposed minority-majority CVAP district, factors that affect the ability of Hispanics to participate effectively in the political process in SBISD, and the subjects on which he was deposed. Ms. Caesar may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.
18. **Chris Earnest**, c/o Defendants' counsel. Mr. Earnest is a SBISD trustee and may testify about socio-economic and community characteristics of SBISD, a proposed minority-majority CVAP district, factors that affect the ability of Hispanics to participate effectively in the political process in SBISD, and the subjects on which he was deposed. Mr. Earnest may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.
19. **Christina Gonzalez**, c/o Defendants' counsel. Ms. Gonzalez is a former SBISD trustee and may testify about socio-economic and community characteristics of SBISD, a proposed minority-majority CVAP district, factors that affect the ability of Hispanics to participate effectively in the political process in SBISD, and the subjects on which she was deposed. Ms. Gonzalez may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.
20. **Pam Goodson**, c/o Defendants' counsel. Ms. Goodson is a former SBISD trustee and may testify about socio-economic and community characteristics of SBISD, a proposed minority-majority CVAP district, factors that affect the ability of Hispanics to participate effectively in the political process in SBISD, and the subjects on which she was deposed. Ms. Goodson may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.
21. **Josef D. Klam**, c/o Defendants' counsel. Mr. Klam is a former SBISD trustee and may testify about socio-economic and community



characteristics of SBISD, a proposed minority-majority CVAP district, factors that affect the ability of Hispanics to participate effectively in the political process in SBISD, and the subjects on which he was deposed. Mr. Klam may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.

22. **Scott Muri, Ed.D.**, 802 N. Sam Houston Ave., Odessa, Texas 79761. Dr. Muri is a former SBISD Superintendent, and may testify about his past experiences as a classroom teacher, dean of students, assistant school principal, school principal, deputy superintendent, area superintendent, and superintendent of schools, the socio-economic and community characteristics of SBISD and a proposed minority-majority CVAP district, the operations of the SBISD Board of Trustees, and factors that affect the ability of Hispanics to participate effectively in the political process in SBISD. Dr. Muri may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.
23. **Karen Peck**, c/o Defendants' counsel. Ms. Peck is a former SBISD trustee and may testify about socio-economic and community characteristics of SBISD, a proposed minority-majority CVAP district, factors that affect the ability of Hispanics to participate effectively in the political process in SBISD, and the subjects on which she was deposed. Ms. Peck may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.
24. **Chris Vierra**, 1135 Waverly Street, Houston, Texas 77008. Ms. Vierra is a former SBISD trustee and may testify about socio-economic and community characteristics of a proposed minority-majority CVAP district and factors that affect the ability of Hispanics to participate effectively in the political process in SBISD. Ms. Vierra may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.
25. Plaintiff reserves the right to call any witness listed on Defendants' witness list, adversely, including any current SBISD trustee, and witnesses identified in the parties' Initial and Amended Disclosures should rebuttal testimony be either desirable or necessary.



Respectfully submitted,

/s/Barry Abrams

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**CERTIFICATE OF SERVICE**

I certify that the foregoing document was served on all parties of record via the Court's electronic filing system on October 6, 2023

/s/Barry Abrams  
Barry Abrams

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

VIRGINIA ELIZONDO,  
*Plaintiff,*

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Civil Action No. 4:21-CV-01997

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SPRING BRANCH INDEPENDENT SCHOOL  
DISTRICT, & COURTNEY ANDERSON,  
JOHN PEREZ, CAROLINE BENNETT,  
SHANNON MAHAN, MINDA CAESAR,  
CHRIS EARNEST, & LISA ALPE IN  
THEIR OFFICIAL CAPACITIES AS  
MEMBERS OF THE BOARD OF TRUSTEES  
OF SPRING BRANCH ISD

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*Defendants.*

**PLAINTIFF'S WITNESS LIST**

Plaintiff expects to call the following trial witnesses:

1. **Diana Alexander**, 10238 Rothbury, Houston, Texas 77045. Ms. Alexander is a registered voter in SBISD. Ms. Alexander is expected to testify about her experiences as a Hispanic SBISD resident and voter, including but not limited to the socio-economic and community characteristics of SBISD, a proposed minority-majority CVAP district and factors that have hindered the ability of Hispanics to participate effectively in the political process in SBISD. Ms. Alexander may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.
2. **Ricardo Barnes**, 8575 Pitner Road, Houston, Texas 77080. Mr. Barnes is Executive Director of the Spring Branch Family Development Center and may testify about the socio-economic and community characteristics SBISD, a proposed minority-majority CVAP district and factors that affect the ability of Hispanics to participate effectively in the political process in SBISD. Mr. Barnes may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30,

50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.

3. **Patricia Cabrera**, 1407 Lynnvlew, Houston, Texas 77055. Ms. Cabrera is a registered voter in SBISD. Ms. Cabrera is expected to testify about her experiences as a Hispanic SBISD resident and voter, including but not limited to the socio-economic and community characteristics of SBISD, a proposed minority-majority CVAP district and factors that have hindered the ability of Hispanics to participate effectively in the political process in SBISD. Ms. Cabrera may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.
4. **Kristin Craft, Ed.D.**, c/o Defendants' counsel. Dr. Craft is SBISD's Associate Superintendent of Academics, was one of SBISD's designated corporate representatives and is expected to testify about the subjects on which the District designated her to be its representative, including but not limited to the subjects on which she was deposed.
5. **Virginia Elizondo, Ed.D.**, 9235 Blankenship Drive, Houston, Texas 77080. Dr. Elizondo is the plaintiff. She is a registered voter in the Spring Branch Independent School District ("SBISD"), a SBISD parent, and was twice a candidate for election as a SBISD trustee. Dr. Elizondo is expected to testify about her experiences as a Hispanic SBISD resident, parent, voter and candidate, including but not limited to the socio-economic and community characteristics of SBISD, a proposed minority-majority CVAP district, and her reasons for contesting the legality of SBISD's at-large system of electing its trustees. Dr. Elizondo may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.
6. **R. Jason Griffin**, 8709 Cedarspur Drive, Houston, Texas 77055. Mr. Griffin is a registered voter in SBISD. Mr. Griffin is expected to testify about socio-economic and community characteristics of SBISD, a proposed minority-majority CVAP district, events occurring during the 2021 SBISD trustee election campaign and factors that hinder the ability of Hispanics to participate effectively in the political process in SBISD. Mr. Griffin may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the

Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.

7. **Karen Heath, Ed.D.**, c/o Defendants' counsel. Dr. Heath is SBISD's Associate Superintendent of Administration and Talent, was one of SBISD's designated corporate representatives and is expected to testify about the subjects on which the District designated her to be its representative, including but not limited to the subjects on which she was deposed.
8. **Duncan Klussmann, Ed.D.**, 1244 Cortlandt St., Houston, Texas 77008. Dr. Klussmann is a former SBISD Superintendent, and may testify about his past experiences as a classroom teacher, assistant school principal, school principal, interim superintendent, area superintendent, superintendent and parent of former SBISD students, the socio-economic and community characteristics of SBISD and a proposed minority-majority CVAP district, the operations of the SBISD Board of Trustees, and factors that affect the ability of Hispanics to participate effectively in the political process in SBISD. D. Klussmann may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.
9. **Noel Lezama**, 9038 Colleen Road, Houston, Texas 77080. Mr. Lezama is a registered voter in SBISD, a SBISD parent, and a former candidate for elections as a SBISD trustee. Mr. Lezama is expected to testify about his experiences as a Hispanic SBISD resident, parent, voter and candidate, including but not limited to the socio-economic and community characteristics of SBISD, a proposed minority-majority CVAP district and factors that have hindered the ability of Hispanics to participate effectively in the political process in SBISD. Mr. Lezama may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.
10. **David Lopez**, 9521 Kerrwood Ln., Houston, Texas 77080. Mr. Lopez is a registered voter in SBISD, a SBISD parent, and a former candidate for elections as a SBISD trustee. Mr. Lopez is expected to testify about his experiences as a Hispanic SBISD resident, parent, voter and candidate, including but not limited to the socio-economic and community characteristics of SBISD, a proposed minority-majority CVAP district and factors that have hindered the ability of Hispanics to participate effectively in the political process in SBISD. Mr. Lopez may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-

exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.

11. **Christine Porter**, c/o Defendants' counsel. Ms. Porter is SBISD's Chief Financial Officer, was one of SBISD's designated corporate representatives and is expected to testify about the subjects on which the District designated her to be its representative, including but not limited to the subjects on which she was deposed.
12. **Roy Rodney**, 800 Bering Drive, Suite 220, Houston, Texas 77057. Mr. Rodney is expected to testify about his experiences as a SBISD resident, parent and voter, including his involvement with the Coalition of Advocates for Restorative Education, preparation of "A Call for Restorative Education Initiatives in the Administration of Discipline in Spring Branch ISD - Report on Discipline and the Disciplinary Alternative Education Program in Spring Branch ISD," the lack of responsiveness of the SBISD Board of Trustees and administration to evidence of disparate disciplinary practices in SBISD, and his observations concerning the what he considers a disparate allocation of resources and access to SBISD facilities to the disadvantage of minority children and his conclusion that adoption of a single-member district plan would make a positive difference. Mr. Rodney may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.
13. **James Shaddix**, 11920 N. Durette Drive, Houston, Texas 77024. Mr. Shaddix is a long-time resident and registered voter in SBISD, a parent of former SBISD students, and an active volunteer in the SBISD community. Mr. Shaddix is expected to testify about the socio-economic and community characteristics of SBISD and a proposed minority-majority CVAP district and factors that have hindered the ability of Hispanics to participate effectively in the political process in SBISD. Mr. Shaddix may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.
14. **Robert M. Stein, Ph.D.**, Rice University, Houston, Texas 77251. Dr. Stein is the Lena Grohlman Fox Professor of Political Science and a fellow in urban politics at Rice University. Dr. Stein is an expert witness who is expected to testify: (a) that there is statistically significant evidence of racially-polarized voting in SBISD Board of Trustee elections for the period 2015-2023; (b) White Non-Hispanics in SBISD vote

sufficiently as a bloc to enable them, in the absence of special circumstances, to defeat the minority voters' preferred candidates of choice; (c) the geographic concentration of Hispanics in SBISD is sufficient to constitute a majority of the voting-age population in one or more single member districts under an illustrative seven-district plan; (d) strong evidence exists in the scholarly literature that: (i) single member district forms of representation enhance proportional representation of minority candidates on legislative bodies; (ii) single member district representation increases the likelihood that minority candidates will contest elections for positions on legislative bodies; (iii) single member district representation will produce policies more responsive to the preferences of minority voters; and (e) in his opinion, SBISD should adopt a single member district plan for the election of the district's seven trustees. Dr. Stein also may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act, and offer testimony in rebuttal to opinion testimony offered by Defendants' expert, John Alford, Ph.D.

15. **Andres Tijerina, Ph.D.**, 2716 Tether Trail, Austin, Texas 78704. Dr. Tijerina is a Professor of history at Austin Community College and has taught at the University of Texas at Austin, the University of Texas at San Antonio and Texas Tech University. Dr. Tijerina is an expert witness who is expected to testify about the history of the violation of civil rights of Latinos in Texas, with emphasis on the electoral process and that, as a result of historical discrimination against Latinos in Texas, Latinos in Spring Branch and in Houston, Texas still bear the effects of this discrimination, which hinders their ability to participate effectively in the political process. Dr. Tijerina may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.

Plaintiff may call the following witnesses:

16. **J. Carter Breed**, c/o Defendants' counsel. Mr. Breed is a former SBISD trustee and may testify about socio-economic and community characteristics of SBISD, a proposed minority-majority CVAP district, factors that affect the ability of Hispanics to participate effectively in the political process in SBISD, and the subjects on which he was deposed. Mr. Breed may testify

about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.

17. **Minda Caesar**, c/o Defendants' counsel. Ms. Caesar is a SBISD trustee and may testify about socio-economic and community characteristics of SBISD, a proposed minority-majority CVAP district, factors that affect the ability of Hispanics to participate effectively in the political process in SBISD, and the subjects on which he was deposed. Ms. Caesar may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.
18. **Chris Earnest**, c/o Defendants' counsel. Mr. Earnest is a SBISD trustee and may testify about socio-economic and community characteristics of SBISD, a proposed minority-majority CVAP district, factors that affect the ability of Hispanics to participate effectively in the political process in SBISD, and the subjects on which he was deposed. Mr. Earnest may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.
19. **Christina Gonzalez**, c/o Defendants' counsel. Ms. Gonzalez is a former SBISD trustee and may testify about socio-economic and community characteristics of SBISD, a proposed minority-majority CVAP district, factors that affect the ability of Hispanics to participate effectively in the political process in SBISD, and the subjects on which she was deposed. Ms. Gonzalez may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.
20. **Pam Goodson**, c/o Defendants' counsel. Ms. Goodson is a former SBISD trustee and may testify about socio-economic and community characteristics of SBISD, a proposed minority-majority CVAP district, factors that affect the ability of Hispanics to participate effectively in the political process in SBISD, and the subjects on which she was deposed. Ms. Goodson may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.
21. **Josef D. Klam**, c/o Defendants' counsel. Mr. Klam is a former SBISD trustee and may testify about socio-economic and community



characteristics of SBISD, a proposed minority-majority CVAP district, factors that affect the ability of Hispanics to participate effectively in the political process in SBISD, and the subjects on which he was deposed. Mr. Klam may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.

22. **Scott Muri, Ed.D.**, 802 N. Sam Houston Ave., Odessa, Texas 79761. Dr. Muri is a former SBISD Superintendent, and may testify about his past experiences as a classroom teacher, dean of students, assistant school principal, school principal, deputy superintendent, area superintendent, and superintendent of schools, the socio-economic and community characteristics of SBISD and a proposed minority-majority CVAP district, the operations of the SBISD Board of Trustees, and factors that affect the ability of Hispanics to participate effectively in the political process in SBISD. Dr. Muri may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.
23. **Karen Peck**, c/o Defendants' counsel. Ms. Peck is a former SBISD trustee and may testify about socio-economic and community characteristics of SBISD, a proposed minority-majority CVAP district, factors that affect the ability of Hispanics to participate effectively in the political process in SBISD, and the subjects on which she was deposed. Ms. Peck may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.
24. **Chris Vierra**, 1135 Waverly Street, Houston, Texas 77008. Ms. Vierra is a former SBISD trustee and may testify about socio-economic and community characteristics of a proposed minority-majority CVAP district and factors that affect the ability of Hispanics to participate effectively in the political process in SBISD. Ms. Vierra may testify about facts and circumstances concerning the factors identified in *Thornberg v. Gingles*, 478 U.S. 30, 50-51, 79 (1986) and the non-exhaustive factors in the Senate Judiciary Committee Report accompanying the 1982 amendments to the Voting Rights Act.
25. Plaintiff reserves the right to call any witness listed on Defendants' witness list, adversely, including any current SBISD trustee, and witnesses identified in the parties' Initial and Amended Disclosures should rebuttal testimony be either desirable or necessary.

Respectfully submitted,

/s/Barry Abrams

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**CERTIFICATE OF SERVICE**

I certify that the foregoing document was served on all parties of record via the Court's electronic filing system on October 6, 2023

/s/Barry Abrams  
Barry Abrams